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Federal Communications Commission
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Industry Proposal for Rating
Video Programming

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CS Docket 97-55

Reply Comments of
THE AMERICAN PSYCHOLOGICAL ADMINISTRATION

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The American Psychological Association (APA), an organization of over 151,000 members and affiliates, hereby submits Reply Comments regarding the Industry Proposal for Rating Video Programming. The APA is concerned that the TV Ratings Implementation Group has ignored the unequivocal results of research on children and television violence, and appears unwilling to incorporate any information to help parents identify potentially harmful content.

In our original Comments, the APA argued that the current industry proposal fails to empower parents to identify which programs that may contain violence. The television industry's proposed system fails to provide parents with the descriptive information necessary to make healthy programming choices for their children. Only with a content descriptive system will Congressional intent and the original aim of the violence chip be recognized.

Overwhelmingly, the majority of comments filed with the Federal Communications Commission speak in opposition to the current industry proposal. In this letter, the APA will respond to the remaining minority of Comments submitted by the Writer's Guild of America, East (WGAE) and to the remarkably similar letters filed by a variety of network affiliates.

Response to Network Affiliates

In addressing the comments of station presidents and general managers of the network affiliates, the APA points to the uniform nature of the letters submitted. As these letters appear to have originated from a single source, the APA will address only a one of the comments within the network affiliates letter.

Each of the letters from the network affiliates makes the point that they have received little or no comment on the new ratings system. In stating this, these stations acknowledge that parents and families are not paying attention or using the current system. Having a system in place that is ignored and, consequently, unused will not contribute to curbing the public health threat of television violence.

Response to Writer's Guild of America, East

In addressing the specific Comments from the Writer's Guild of America, East, the APA wishes to respond to the following statements made by the Writer's Guild.

"That system (the voluntary age based labeling guidelines) was designed to protect children from programming which is inappropriate or them - the central concern voiced by Congress as well as by proponents of a television ratings system." (WGAE Comments, page 1, paragraph 2)

The central tenet of the development of a television ratings system is to provide a labelling guideline that will work in

concert with the violence chip (v-chip). The violence chip was designed with the purpose of giving parents a tool to help specifically identify violent content in a particular program so they can shield their child from potentially harmful programming.

The reasons for this are simple and well proven. The continued viewing of violence by children puts their health at risk and teaches aggressive behavior. Our research shows that television violence impacts children in several ways:

- It models aggressive behavior that children may imitate;
- It desensitizes children to violence and causes them to view victims of violence less compassionately;
- It models anti-social means of resolving conflicts and dealing with frustration; and,
- It tends to minimize the negative consequences of violence.

Clearly, television violence presents a public health threat to our nation's children. Comments submitted by leading medical and health organizations, such as the American Medical Association, the American Academy of Pediatrics, and the Academy for Child and Adolescent Psychiatry, echo this threat to children. The violence chip was created as a means to specifically address that threat, doing so through the identification of violent content in certain programming. In using an age based ratings system, the parent is unable to decipher which programming might have violent content. As early tests have indicated, 60-70% of current programming is rated "TV-PG" which has allowed for a broad range of content to be included in the "TV-PG" category. Therefore, parents can not specifically distinguish content among 60-70% of current programming. More specifically, parents can not distinguish which programming carries violent content, regardless of the industry proposed rating.

"To make those symbols reflect content in a less sophisticated way - identifying programs as containing unexplained and uncategorized violence, sex, or language - is to fail to understand the variation in the quality of programs." (WGAE Comments, page 2, paragraph 1)

To adhere to the current age based system is to leave the violence chip with a labelling system that is vague and non-specific and predetermines what is appropriate for children nationwide. In contrast to the WGAE statement, providing parents with the information of whether a program contains violence or sex or language does explain and does categorize that program. By allowing vague, age based ratings, the industry fails to recognize the "extraordinary variation" in children at a given age. With age based ratings, parents are taken out of the decision making process and are expected to be held to the age guidelines crafted by television industry executives. Researchers have shown that children vary in maturity, in cognitive skills, and in cognitive development at any given age. Only parents can make the determination of what is appropriate for their child. The industry

proposed age based system fails to allow parents the disclosure of a program's content and assigns the program a generalized age based rating that tells the parent what is appropriate for their child, regardless of the child's level of development.

"In such a system (content based), the violence of "Schindler's List" is the same as the violence of an artless "shoot 'em up" exercise." (WGAE Comments, page 2, paragraph 4)

It is important to note that researchers at the University of California-Santa Barbara determined that, of the violent portrayals on television, only 4% had anti-violence messages. Even in the 4% of anti-violence programs, images were present that may not be suitable for young children or children with histories of violent and aggressive behavior. It is the parent's job to make this determination, not the television industry. The claim that "Schindler's List" and "an artless shoot 'em up" would be given the same rating is to ignore that this also happens under the current industry proposal, albeit in a more vague way that fails to alert the parent of specific dangers within the program.

In conclusion, as letters and comments supplied to the FCC indicate, there is broad, national disagreement with the current industry proposal. Medical and public health organizations, religious organizations, Members of Congress, and, most importantly, parents have expressed their objection to the FCC to the current industry proposal. With the current system in place, the violence chip will be ineffective, parents will continue to be refused disclosure about potential harmful content in a program, and the wealth of research on dangers to children via television violence will go unheeded.

With these reply comments, the American Psychological Association again urges the Federal Communications Commission to reject the TV Ratings Implementation Groups proposed ratings system.